

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL SECTION

FILED  
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2005 FEB -1 P 12:27

\_\_\_\_\_  
LOUIS ALBERGHINI,  
Plaintiff,

v.

\_\_\_\_\_  
SIMONDS INDUSTRIES INC.,  
Defendant.  
\_\_\_\_\_

CIVIL ACTION NO. 04CV11024

**PLAINTIFF'S MOTION TO ENLARGE TIME FOR EXCHANGING EXPERT  
WITNESS INFORMATION PURSUANT TO FED.R.CIV.P. 26 (a) (2)**

NOW COMES the Plaintiff, Louis Alberghini, to move the court to enlarge the time for the filing of the summary reports and expert witness disclosures pursuant to Fed.R.Civ.P. 26 (a) (2), which are currently due on January 31, 2005 according to the scheduling order. The Plaintiff seeks to extend the due date for filing his experts' summary reports and required disclosures for one week to February 8, 2005.

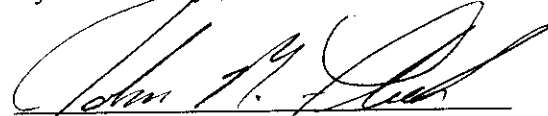
As grounds for the enlargement of time, the Plaintiff states that he has been notified through his attorney that the Plaintiff's expert witness cannot comply with the January 31, 2005 deadline due to that Plaintiff's economic damages expert needs 2004 W-2 information to complete his report and Plaintiff's statistician's spouse is undergoing surgery on January 31, 2005 and needs a little additional time of complete his report for that reason. The Defendant will not be prejudiced by this short extension.

WHEREFORE, the Plaintiff prays the court will allow this motion for enlargement of the time for the filing of the summary reports and required expert disclosures as specified herein.

Respectfully submitted,

LOUIS ALBERGHINI

By his attorneys,

A handwritten signature in black ink, appearing to read "Marcia L. Elliott", is written over a horizontal line.

Marcia L. Elliott, Esq. (BBO# 564291)

John M. Flick, Esq. (BBO# 652169)

Elliott Law Office, P.C.

307 Central Street

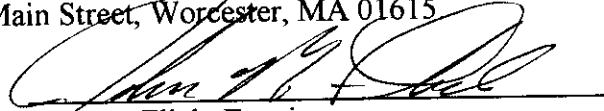
Gardner, MA 01440

(978) 632-7948

Dated: January 31, 2005

**CERTIFICATE OF SERVICE**

I, John M. Flick, Esquire, hereby certify that I have this day served a true copy of the foregoing by faxing and mailing said copy, first class, postage prepaid to Defendant's attorney, Jonathan Sigel at Bowditch & Dewey, LLP, 311 Main Street, Worcester, MA 01615

  
John M. Flick, Esquire